EXHIBIT 35

In The Matter Of:

INTELLECTUAL VENTURES I LLC

v.

MOTOROLA MOBILITY, LLC

RANDY H. KATZ, Ph.D. - Vol. 1

July 17, 2013

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1   Q. You didn't consider whether a mobile phone is
2 a handset?
3   A. I'm still struggling to understand exactly
4 what a handset is, or what we consider a handset to be.
5 I know of a plain old telephone that is a handset; I
6 know of a smartphone. I'm unaware of necessarily
7 calling the smartphone a "handset."
8   Q. Do you agree that a mobile phone would be a
9 CPE?
10   MR. SANDERS: Objection, form.
11   THE WITNESS: I think a cordless phone would
12 be a CPE, customer presence equipment. I think a mobile
13 phone, I would feel more comfortable defining that as a
14 customer premise equipment station, as opposed to a CPE.
15 BY MR. ALBERTI:
16   Q. Fair enough. So a mobile phone would be, in
17 your view, an example of a customer premise equipment
18 station.
19   A. Yes.
20   Q. What's a PBX?
21   A. A PBX is a private branch exchange.
22   Q. What exactly is a private branch exchange?
23   A. It's a local switching center or switchboard
24 for an office or for a business.
25   For example, at the, at Berkeley, the

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1 University of California at Berkeley, we have the 642
2 followed by a thousand numbers. And the campus has its
3 own switching equipment for connecting phones and
4 managing the phones. And their connectivity to the
5 public switched telephone network and the device that
6 manages those phones and provides connectivity for those
7 phones, it would be called a PBX.
8   Q. Would a PBX be a CPE under Motorola's proposed
9 construction?
10   A. It certainly is included in the list of items
11 that's a CPE by the Patent Office.
12   Q. In your opinion, would a PBX be a CPE?
13   A. I think it would be, under, under Motorola's
14 proposed construction.
15   Q. Let's go to the next term, "base station."
16   A. How are we doing on time? We've been about an
17 hour.
18   Q. I'm sorry. We are about at an hour exactly,
19 so if you'd like, we can take our first break.
20   A. I would like to take a break.
21   Q. All right.
22   THE VIDEOGRAPHER: Going off the record, the
23 time is 10:02.
24   (Recess)
25   THE VIDEOGRAPHER: Back on the record, the

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1 time is 10:13.
2 BY MR. ALBERTI:
3   Q. When we left off, we were talking about claim
4 terms. And just to recalibrate, I'll just direct your
5 attention again to page 10 of Mr. Seely's report.
6   A. Yes.
7   Q. The second term in the chart is "base
8 station." Do you see that?
9   A. I do.
10   Q. Do you -- I'll say this. I take it you
11 endorse Motorola's construction on this term?
12   A. I do.
13   Q. Do you see any substantive difference between
14 Motorola's construction and IV's proposed construction?
15   A. The Motorola's proposed construction does not
16 limit the communicating devices to CPEs.
17   Q. Other than that, is there any major
18 disagreement you had between the constructions?
19   A. There is this, a theme of what is the network
20 to which the base station provides access to. In the
21 Motorola construction, it is -- the term that's used is
22 "telecommunication carrier," compared to a "network."
23   Q. You believe Motorola's construction is more
24 accurate in that context.
25   A. I do.

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1   Q. Let's move on to the next construction,
2 "wireless bandwidth." I take it you endorse Motorola's
3 construction?
4   A. I do.
5   Q. What is -- for the record, Motorola's
6 construction reads, "a communication medium employing
7 analog carrier signals."
8   What is an analog carrier signal?
9   A. An analog signal -- let's break it down sort
10 of piece by piece.
11   So an analog signal is to distinguish it from
12 a digital signal, which takes on only two values: One
13 and zero. Analog can take on a continuous set of
14 values.
15   "Analog carrier" implies that I will impose on
16 the signal a structure with which to encode information.
17 So in a sense, the carrier -- it's called a carrier
18 because it carries information. It's a way of taking
19 the analog signal and modifying it to represent digital
20 information. So it is a communications medium, the
21 ability to exchange information, employing an analog
22 wave form which carries information or in which digital
23 information can be imposed on that analog wave form in
24 order to encode information.
25   Q. In your opinion, would wireless bandwidth

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1   occur over a wireless communication medium?
2   A. That seems like kind of a circular definition
3   to me, wireless bandwidth over a wireless network.
4   Q. Well, as far as the communication medium, what
5   would be a wireless communication medium?
6   A. Radio signals would be a wireless
7   communications medium.
8   Q. Any other examples?
9   A. Within the context, another example would be
10 satellite signals would be -- again, the way in which a
11 satellite communicates between space and the ground
12 would be another example of a wireless signal.
13   Q. So we have satellite, RF. Any others that you
14 can think of?
15   A. In the context of the patent, there's also
16 reference to cable.
17   Q. Does cable use RF?
18   MR. SANDERS: Objection, form.
19   THE WITNESS: Cable -- you know, part of the,
20 I think, in support of Motorola's construction, cable
21 uses an analog carrier signal in order to encode digital
22 information and the way in which that signal is
23 modified. So the terminology of "analog carrier signal"
24 applies to communication over a cable, but it is a bit
25 of a stretch to say that radio, RF or radiofrequency

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1   encodings are in particular used over the cable.
2   BY MR. ALBERTI:
3   Q. In your experience, have you ever referred to
4   cable communication as wireless?
5   A. You know, it's almost like a, a sort of
6   antidefinition: "Cable" implying a wire, and "wireless"
7   implying, Look, Mom, no wires.
8   I think it sort of comes from the fact that
9   cable, cable can be used in, in several different
10 contexts. Cable can be used to transmit Ethernet
11 signals; you could use a cable to implement an Ethernet.
12 But I think in the context of the patent the use of the
13 terminology related to "cable" had to do with cable
14 television. And cable television, the kind of cable
15 used in cable television is used to carry, or at least
16 in the time frame of the patent, was used to carry
17 analog television signals, which are comparable to
18 broadcasting from an old-fashioned, you know, sort of
19 tower on Mt. Sutro or something like that.
20   So I think it would be a bit of a stretch to
21 apply "wireless" to cable normally, or cable TV, but
22 the, the sort of way of thinking about it would be that
23 the kind of cables used in a cable television system are
24 used to transmit television signals, which the
25 traditionally, at least until the last few years, were

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1   transmitted without wires.
2   Q. I believe in your report you made reference to
3   a cable, a coaxial cable acting as a waveguide. Do you
4   recall that?
5   MR. SANDERS: Objection to form.
6   THE WITNESS: I do. It probably is not a bad
7   idea to go take a look at it.
8   BY MR. ALBERTI:
9   Q. Let's take a look at it, yes.
10   A. Okay. So Exhibit 1. Can you point me at the
11 particular paragraph you have in mind?
12   Q. Find it . . . So if you take a look at
13 page 16.
14   A. Sixteen, page 16.
15   Q. Paragraph 46.
16   A. Forty-six.
17   Q. Second sentence.
18   A. Yes.
19   Q. Do you see that you state there, you give
20 reference to coaxial cable acting as an RF waveguide?
21   A. "I note that" -- so I'm quoting from what I
22 wrote in my report. "I note that 'wireless bandwidth'
23 as used in the patent encompasses media, such as coaxial
24 cable, that act an RF waveguide," which is the way in
25 which -- if you can, you know, put yourself back in a

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1   time machine and go back about, to the time frame of the
2   mid 1990s, before we had Infinity digital television on
3   demand, you basically got a bunch of analog encoded
4   television signals that went down that coax cable into
5   your home and then were delivered to your TV set. So
6   that's where that comes from.
7   Q. So by "RF waveguide," it would be a guide,
8   that would guide RF signals from your antenna into your
9   TV.
10   A. Let's try and get that right.
11   So the, the way in which the coaxial cable was
12 used in a cable TV system of the time frame of the mid
13 1990s, predigital television and all that, you basically
14 got a, an analog signal within a particular frequency
15 range that looked identical to the kind of signal that
16 would come into your rabbit ear antenna coming down that
17 wire on the frequency for Channel 2, the frequency for
18 Channel 4, the frequency for Channel 5, that through an
19 appropriate adaptor connected to the cable on one end
20 and your TV on the other end, would allow you to select
21 between those to look at Channel 2 on your TV or
22 whatever. So it kind of, in a way, replaced the
23 antenna, which would be able to pick up signals over the
24 air, truly wireless, if you would, without wires.
25   The cable was kind of -- you know, actually,

14 (Pages 50 to 53)

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1   cable TV, the coaxial cable is, I have a little bit of
2   history in this because as an undergraduate at Cornell
3   University in the early 1970s, I got my fraternity to
4   sign up to be one of the first customers of Home Box
5   Office. And at the time, those systems were called
6   community area, community -- community antenna
7   television systems. Because basically, the coaxial
8   cable, if you were in a part of the world like Ithaca,
9   New York, which was far from any major metropolitan
10 area, if you wanted to watch TV the choices were very
11 limited. So the coaxial cable could bring in -- would
12 be a way of distributing multiple television stations --
13 maybe from New York, maybe from Buffalo, maybe from
14 Syracuse -- and it would just plug into exactly where
15 the antenna was on your TV in order to be able to see
16 those things.
17   So the signals carried are, are, again, in
18 this time frame, were radiofrequency analog carrier, as
19 opposed to being characterized by being without wires.
20   **Q. In contrast, a standard Ethernet cable would**
21 **be, carry a digital signal.**
22   A. Again, it's a little bit more complicated than
23 that. The Ethernet cable carries an analog carrier
24 signal, but that analog carrier signal is encoded in
25 such a fashion, you know, to think about it as --

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1   imagine that it is, you know, something that looks like
2   a sine wave: Hill, valley, hill, valley, hill, valley,
3   playing forward in time. If I sort of make that signal
4   come faster -- hill, valley, hill, valley, hill, valley,
5   hill, valley, hill, valley -- by, by modifying the
6   frequency of the wave form, I can encode ones versus
7   zeroes. I can do it also by, you know, amplitude. Big
8   signal, little signal, big signal, little signal can
9   distinguish between ones and zeroes, and many more
10 sophisticated things.
11   The cable TV system that was delivering TV to
12 our fraternity's television set in 1973 and '4 didn't
13 work like that. It was just basically the straight
14 signals that were encoding the television picture. But
15 the -- you know, at some level, it's the same looking
16 train of hills and valleys; it's just how you interpret
17 what the hills and valleys mean that distinguish
18 Ethernet cable and what we use it for from the analog TV
19 system.
20   And that was, I think, the basis for
21 supporting the definition here of the analog carrier
22 signal as being the distinguishing aspect of wireless
23 bandwidth that would encompass both the context in the
24 patent of both cable and wireless or radio signaling.
25   **Q. So an Ethernet cable, you wouldn't say that**

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1   **that employed analog carrier signals.**
2   A. I think I just said that it did.
3   **Q. It did. So . . . okay. So I guess, what**
4 **wouldn't be wireless bandwidth then, if . . .?**
5   A. Well, going back to the question you just
6 asked, to attempt to clarify it, the, the -- a key
7 aspect of the term here is "analog carrier signal," as
8 distinguished from "analog signal."
9   So let's say that the TV signal that goes down
10 the cable TV to that 1973 television set was an analog
11 signal identical to the way in which an analog signal
12 over the air encoded a TV program, but the analog
13 carrier signal is a foundation for encoding binary data.
14 The carrier is like a baseline, like a heartbeat. And
15 the way in which that heartbeat is modified in time to
16 beat faster or slower or louder or softer, for example,
17 is a way in which it is still an analog carrier but it
18 encodes digital information.
19   And, and then coming back to your subsequent
20 question, what isn't an analog carrier signal, that is a
21 very good question because any -- with the exception of
22 something like the way Morse code works -- dot dash, dot
23 dash -- just about all modern digital communication is
24 founded on an analog carrier signal.
25   **Q. So taking defendant Motorola's proposed**

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1   **construction, other than Morse code, can you think of a**
2 **communication medium that would not be employing analog**
3 **carrier signals?**
4   A. Well, again, it's sort of like how does
5 wireless bandwidth encompass both radio transmission and
6 cable, which is what's in this patent, which is in the
7 patent specification? Wireless bandwidth applies to --
8 there's a figure that says, shows little, you know,
9 lightning bolt and says wireless and as well as cable or
10 something like that. So one struggles to try and define
11 what is a way of defining that term.
12   The plain and ordinary meaning is actually
13 not -- I don't know how to stretch "wireless" to include
14 both radio and cable without looking at the common
15 denominator in both of those elements of the
16 specification, which is where the analog carrier signal
17 comes from. So I mean, that's sort of -- that's why I
18 support that in the effort to read the term to
19 incorporate both wireless and cable as a communications
20 mechanism.
21   **Q. You would agree that the plain and ordinary**
22 **meaning of "wireless" means no wire.**
23   A. That's true. So does that mean wireless
24 bandwidth does not apply to cable as a communications
25 medium? Plain and ordinary definition.

15 (Pages 54 to 57)

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1   Q. By "simultaneous communicating entities,"
2   you're referring to two end points.
3   A. That's a little indeterminate to me, the
4   question that you asked.
5   Q. What do you mean by "simultaneous
6   communicating entities"?
7   A. Okay. So let me give you an example. A wants
8   to talk to B while C wants to talk to D. There is a
9   sequence of steps that A will go through in order to
10   communicate with B, or sequence of, of -- for purposes
11   of the example, let's say wire hops to get from A to B.
12   In a circuit, like the way the old phone
13   system worked, like the old switchboard operator
14   establishing Randy calling Dave, there would be
15   dedicated wires that were dedicated just to the two of
16   us communicating. That would be a traditional
17   connection-oriented, circuit-oriented communication
18   method.
19   In the idea of virtual circuits, these -- it
20   appears to the communicating end points that they have a
21   dedicated circuit, but those hops could be used by,
22   simultaneously by somebody else. So if C communicating
23   with D needed to use one of those links, the system
24   would be able to kind of adjudicate and manage or
25   arbitrate: Our communication gets to go, then C talking

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1   to D gets to go, then A talking to B gets to go, and so
2   on. So they're actually shared between those, as
3   opposed to physically dedicated.
4   Q. I think I understand. So, but as far as A
5   communicating to B, the packets that are sent from A to
6   B would travel along the same circuit path.
7   A. They would.
8   Q. Okay. And the packet sent from C to D would
9   also travel along the same circuit path.
10   A. Just to be clear, it need not be the same as
11   the ones that A are communicating to B would follow.
12   Q. Understood, understood. And the point, I
13   guess, the thing that makes it virtual is there may be a
14   piece of that path that could be shared between A and B
15   and C and D.
16   A. Correct.
17   Q. When you say that one of the strengths is the
18   "virtual circuit concept, with call set-up in advance of
19   data transmission," what do you mean by the "call set-up
20   in advance of data transmission"?
21   A. Point me to the . . .
22   Q. I'm sorry. It's the first sentence under
23   "Strengths." And I had asked you about the virtual
24   circuit piece. I guess I'm asking about the second
25   piece where you talk about "call set-up in advance of

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1   data transmission."
2   A. So this is under "Strengths."
3   Q. Yes.
4   A. Which, are we talking about the first
5   paragraph? Fundamental assumption? The sentence that
6   starts, affirmative, fundamental assumption?
7   Q. I think --
8   A. Because I don't see the call set-up part
9   there. It's somewhere else.
10   Q. Are we on page 12?
11   A. Okay, sorry. I was on the wrong page. So
12   we're talking in the second full, the first full
13   paragraph, I guess.
14   Q. Under 4.4 --
15   A. Oh.
16   Q. -- where it says "Strengths."
17   A. Strengths. I'm sorry. I was looking in the
18   wrong place. "One of ATM's key strengths is its virtual
19   circuit concept, with the call set-up in advance of data
20   transmission." That's your, that's the --
21   Q. Right. My question is, what do you mean by
22   "call set-up in advance of data transmission"?
23   A. Well, ATM is a connection-oriented protocol so
24   before you can send data from point A to point B, you
25   have to establish the circuit between them. So there's

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1   a kind of -- an element of the ATM protocols is, you can
2   call it connection set-up or call set-up, where you
3   initially engage with and handshake with the system in
4   order to ensure that it has the resources to support the
5   data transmission that you wish to accomplish.
6   Q. You agree that in IP, it is a connectionless
7   protocol, true?
8   A. I agree with that statement.
9   Q. In IP, you would not need to do call set-up in
10   advance of data transmission.
11   A. This is true.
12   Q. The next sentence reads, "This is critical for
13   ATM's ability to manage scarce resources and achieve its
14   evolving model of quality of service guarantees."
15   Do you agree with that?
16   A. It's what I wrote, yes.
17   Q. What did you, what did you mean in this time
18   frame about the "evolving model of quality of service
19   guarantees"?
20   A. So ATM defines a variety of quality of service
21   classes -- primarily constant bit rate, variable bit
22   rate, and available bit rate. And it has a particular
23   model for describing how network resources should be
24   managed to support different kinds of communication
25   patterns based on those three underlying primitives, or

24 (Pages 90 to 93)

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1 some of the prior art associated with today's discussion
2 about the patent, at the time I wrote this I wasn't
3 aware of the totality of work in the mobile ATM arena.
4 There, there is work that was done to provide a kind of
5 a short-circuit reestablishment of a, an ATM connection
6 in the event of a switch failure that did not require a
7 full teardown and reestablishment.
8   So I guess the point that I'm trying to make
9 is I did write this; this was the opinion I had at the
10 time of, we're saying sort of somewhere in 1998, of what
11 I knew at that time. But there was work that was going
12 on that was addressing all of the weaknesses that are
13 addressed in these sections. So, you know, if we had,
14 if we had time and access to Google, we could
15 undoubtedly find literature that addressed each one of
16 these shortcomings with some creative approach with how
17 to address it, like partial rebuild after a failure.
18   So this is, this article in part was written
19 to establish something of a research agenda for the
20 community. So there were people who were -- I may not
21 have been completely aware of everything that was going
22 on at the time I wrote it -- but there were people who
23 were working on each one of these shortcomings at the
24 time.
25   So it's not fair to really say that, you know,

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1 it was impossible for ATM to do a certain function. It
2 could evolve to support some of these mobility features.
3   Q. And at the time, it was still evolving, true?
4   A. ATM was standardized at the time, and the sort
5 of discussion was ways in which it could evolve into the
6 future.
7   Q. So going back to our table where we talk about
8 packet-centric protocol.
9   A. Okay. So we are referring back to Exhibit 4,
10 page 10 --
11   Q. Yes.
12   A. -- -ish? Ten, 11?
13   Q. You agree that, you agree with Motorola's
14 construction for "packet-centric protocol," correct?
15   A. Yes.
16   Q. You would agree that under Motorola's
17 construction, ATM is a packet-centric protocol.
18   A. Yes.
19   Q. True? You would also agree that a
20 circuit-switched protocol that used packets would also
21 be a packet-centric protocol.
22   A. I'm sorry; I actually said something wrong
23 just a moment ago. Allow me to correct myself.
24   We are discussing -- your question asked about
25 a packet-switching protocol, and the term to be

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1 construed is a "packet-centric protocol." So I want to
2 make sure we're talking about the same thing. And I, I
3 did -- I was not being, listening precisely enough to
4 the question that you asked.
5   So you asked a question about packet switched,
6 do I agree that ATM is packet switched. My statement
7 would be it is a packet-centric protocol, but it is a
8 connection-oriented protocol.
9   Q. You would agree that under Motorola's proposed
10 construction of "packet-centric protocol," a
11 circuit-oriented protocol that transmitted data units in
12 the form of packets would satisfy the definition. Maybe
13 I could try to restate that.
14   A. There was, there were several different pieces
15 there, so maybe we can build it up kind of piece by
16 piece.
17   Q. Do you agree that Motorola's proposed
18 construction of "packet-centric protocol" would read on
19 a circuit-oriented protocol that used packets?
20   A. Generally, the terminology that's used is
21 either circuit, circuit-based or circuit-switched or
22 connection-oriented, and you kind of included both of
23 those. So just to be, try and be precise, I would say
24 that it does -- a packet-centric protocol that was
25 connection-oriented yet still used packets as, you know,

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1 small units as the transmission units, so-called
2 packets, would qualify as a packet-centric protocol.
3   Q. Okay. Now let me try to -- I'll break it up.
4 And it wasn't done on purpose, but I understand where
5 we're -- I mixed the terms up.
6   Would you agree that a circuit-switched
7 protocol that used packets as a transmission unit would
8 qualify as a packet-centric protocol under Motorola's
9 proposed construction?
10   A. So we have packets, connection-oriented,
11 packet-switched?
12   Q. Circuit-switched protocol that used packets as
13 a transmission unit would qualify as a packet-centric
14 protocol under Motorola's definition.
15   A. Yes.
16   Q. You would also agree that under Motorola's
17 definition, a connection-oriented protocol that used
18 packets as a transmission unit would qualify as a
19 packet-centric protocol.
20   A. I'm trying -- you're making some distinctions,
21 and I'm kind of like losing a little bit of focus on, on
22 each one of these elements that you're asking me
23 questions about. So I think you said -- maybe you
24 should just repeat it, slowly.
25   Q. Would a connection-oriented protocol that used

26 (Pages 98 to 101)

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1 packets as a transmission unit qualify as a
2 packet-centric protocol under Motorola's definition?
3   A. It would.
4   Q. Any protocol that used packets as a
5 transmission unit would qualify as a packet-centric
6 protocol under Motorola's proposed construction, true?
7   A. Yes.
8   Q. Let's go to page 11. The first term at the
9 top of page 11 is "packets to be communicated over said
10 wireless bandwidth." And actually, this is one where
11 there was an amended construction.
12   A. Uh-huh.
13   Q. So let's turn to -- okay. On page 14 there's
14 a table that includes both the original construction and
15 the amended construction. And I think the difference is
16 that we've added the phrase "each structured with a
17 header and a payload." That was added to Motorola's
18 construction.
19   A. I was going to ask you, who's "we," kemosabe.
20   Q. Sorry.
21   A. Yeah. I'm trying to remember . . . the key
22 difference being explicitly identifying the header and a
23 payload but also the use of the header and payload for
24 the purposes of transmission.
25   Yeah. The only, the only -- there's a new

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1 phrase, "each structured with a header and payload."
2   Q. You would agree that a packet includes a
3 header and a payload, true?
4   A. Yes.
5   Q. And the payload may actually include a header
6 from a higher layer in the system.
7   A. Yes.
8   Q. What is your interpretation of the phrase
9 "organized for transmission"?
10   A. That the bundles of data are organized in the,
11 in the network for a purpose, and that purpose is to
12 stage it, to hold it in readiness for the purposes of
13 sending it in an efficient fashion or receiving it in an
14 efficient fashion over the wireless bandwidth. So the,
15 the "organized" is about the staging of the data.
16   Q. When data is staged, as it traverses a
17 protocol stack, different headers may be attached to a
18 particular packet, true?
19   A. True.
20   Q. When, when this occurs, is it common to store
21 the header in one location of memory and the payload in
22 a different location of memory?
23   MR. SANDERS: Objection to form.
24   THE WITNESS: That is not common, in my, to my
25 knowledge.

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1 BY MR. ALBERTI:
2   Q. In your interpretation, does "organized for
3 transmission" mean that a packet header has to be stored
4 in an adjacent memory cell to a packet payload?
5   MR. SANDERS: Objection to form.
6   THE WITNESS: I don't view that as a
7 restriction.
8 BY MR. ALBERTI:
9   Q. So it would be fair to say that you could have
10 a packet organized for transmission with a packet header
11 stored in one location of memory and a packet payload
12 stored in another location of memory?
13   A. I guess hypothetically, you could. There are
14 inefficiencies associated with taking fast-arriving
15 things and splitting them and putting them in two
16 different places. So there could be efficiency reasons,
17 but . . . And it has to be assembled into one place for
18 successful transmission forward from, from wherever it's
19 currently stored. So I'm, I'm a little at a loss as to
20 what the motivation for splitting it would be. Is it
21 impossible to split it? It would be hard to say yes.
22   Q. Certainly you wouldn't exclude it from the
23 scope of the claim if a designer chose to store a packet
24 header in one location of RAM and packet payload in
25 another [unintelligible] --

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1   THE REPORTER: I'm sorry; I didn't understand
2 the last part of that question.
3   (Record read by the reporter:
4   Q. Certainly you wouldn't exclude it from
5   the scope of the claim if a designer chose
6   to store a packet header in one location
7   of RAM and packet payload in
8   another . . .)
9 BY MR. ALBERTI:
10   Q. . . . location of RAM and associate the two
11 with a pointer.
12   MR. SANDERS: Objection to form.
13   THE WITNESS: RAM being random access memory?
14 BY MR. ALBERTI:
15   Q. Yes.
16   A. It seems counterintuitive that that's a good
17 organization for transmission. I guess I'm sort of at a
18 loss for understanding the motivation for splitting it.
19 Why, why would a designer do that? What is the
20 efficiency to be gained by having it in two places?
21   Q. Are you, are you an expert --
22   A. I guess --
23   Q. -- in memory architecture?
24   A. Well, in a way, yes.
25   So does, does this absolutely exclude

27 (Pages 102 to 105)